

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Complaint Against KCPL)
by Kevin and Laura Fitzpatrick) Docket No. 20-KCPE-107-COM

**NOTICE OF FILING OF ADDENDUM TO STAFF'S REPORT AND
RECOMMENDATION**

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), and submits this Addendum to its Report and Recommendation regarding the Complaint against Evergy Kansas Metro, formerly known as Kansas City Power and Light (KCPL).¹ This Addendum seeks to incorporate the data requests and certain portions of the National Electrical Code and Evergy Kansas Metro's Electric Service Standards referenced within the Report and Recommendation. Portions of the data request responses have been designated confidential and, as such, have been redacted.

WHEREFORE, Staff submits its Report and Recommendation for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Carly R. Masenthin

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¹ See Docket No. 20-KCPE-122-CCN, in which the Commission approved KCPL's name change to Evergy Kansas Metro.

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stinger Tim Interrogatories - KCC_20191120
Date of Response: 12/3/2019

Question:1

On April 21, 2019, customer reports a partial power outage. Does the AMI meter reflect a partial outage on that date?

How long was the outage?

Did any of the other customers served from the same transformer report a partial outage for April 21, 2019?

Response:

On April 21, 2019, customer reports a partial power outage. Does the AMI meter reflect a partial outage on that date?

We don't show any report of partial power from the customer, or any other customers on 4/21/19. According to the Customer Care and Billing System, the customer called in on 4/24/19 for a partial power at 21:32. DSO made repairs and cleared the trouble ticket at 22:39. The AMI meter reported power a single ping power off on 4/17/19 at 18:09. Meter pinged back on 4/24/19 at 22:25.

How long was the outage?

The AMI meter reported power a single ping power off on 4/17/19 at 18:09. Meter pinged back on 4/24/19 at 22:25.

Did any of the other customers served from the same transformer report a partial outage for April 21, 2019?

No

Response provided by:
Jeremy Seever and Anthony Shaw, Distribution System Operations

Attachment:
Q1_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stinger Tim Interrogatories - KCC_20191120
Date of Response: 12/2/2019

Question:3

On 6/9/18, 8/5/18, and 1/12/19 outages occurred because of vegetation. Was the outage on the open wire secondary, or the primary for each outage?

How long was each outage?

How many customers were out for each outage?

Provide a description of the vegetation that caused the outage for each date.

Response:

The response is considered **CONFIDENTIAL** as it contains information relating directly to specific customers.

6/9/18:

Was the outage on the open wire secondary, or the primary for each outage?

Primary.

How long was each outage?

147 minutes total. (44 minutes initially, 103 minutes after isolating it to fewer affected customers).

How many customers were out for each outage?

1216 customers initially, then isolated down to 385 customers

Provide a description of the vegetation that caused the outage for each date.

Breaker initially locked-out. We had a report of arcing at [REDACTED] Troublemaker found burnt limbs on the ground there, but no line damage. We closed the breaker back in and it held, but one phase had less load than before. We continued to patrol and found a primary wire down at [REDACTED].

8/5/18:

Was the outage on the open wire secondary, or the primary for each outage?

Primary

How long was each outage?

319 minutes

How many customers were out for each outage?

331 customers

Provide a description of the vegetation that caused the outage for each date.
No description available. "Vegetation-trees" only indication in notes on outage.

1/12/19:

Was the outage on the open wire secondary, or the primary for each outage?

Primary

How long was each outage?

2156 minutes

How many customers were out for each outage?

30 customers

Provide a description of the vegetation that caused the outage for each date.

Tree limb on backbone of primary at [REDACTED].

Also called for tree crews at [REDACTED].

Information Provided By: Justin Pippitt

Attachment: Q3_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stinger Tim Interrogatories - KCC_20191120
Date of Response: 12/2/2019

Question:4

Please provide the AMI meter data for 1/17/19 prior to the outage and post outage.

How long after EKM reported the outage did EKM ping the meter?

Did any other AMI meters off the same transformer report any outages?

Response:

Evergy's Meter Data Management (MDM) system recorded an outage beginning 1/17/2019 at 10:39:39 am and it was resolved on 1/17/2019 at 10:40:31 am. The Outage Management System (ODS) records show the outage was reported at 10:39 am and the outage event closed at 10:44 am with cancel reason "Meter reported power on".

Information Provided By: Brad Walsh

Attachment: Q4_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20191120
Date of Response: 12/5/2019

Question:5

Please provide the AMI meter data for the duration of the outages on 2/14/19, 2/15/19, 4/8/19, 4/9/19 and 4/17/19.

How long is each outage according to the AMI?

How long after EKM reported the outage did EKM ping the meter?

Did any other AMI off the same transformer report any outages?

Was anyone sent to the site to look at the vegetation and see if that could be causing the outages?

Response:

Please provide the AMI meter data for 1/17/19 prior to the outage and post outage.

1/17/19 the meter pinged off at 10:39, and back on at 10:40.

2/14/19 the meter pinged off at 06:11 and back on at 06:17.

2/15/19 the meter pinged off at 11:19 and back on at 11:19.

4/8/19 the meter pinged off at 18:10 and back on at 18:27.

4/9/19 the meter pinged off at 13:41 and back on at 18:46.

4/17/19 the meter pinged off at 18:09. The next power up indication came in at 22:25 on 04/24/19.

How long after EKM reported the outage did EKM ping the meter?

The meter power ups are listed above.

For pings initiated manually, our systems track only the most recent occurrence. History indicates last manual ping for the address was performed 8/18/15.

Did any other AMI meters off the same transformer report any outages?

Not on the dates listed.

Was anyone sent to the site to look at the vegetation and see if that could be causing the outages?

No, crews are not sent to investigate single outages reported by AMI. Issues with the software have proven single outage reports to be unreliable so we do not send a crew unless we hear from the customer or receive more than one outage report from the meters associated to the transformer.

Response provided by:

Jeremy Seever and Anthony Shaw, Distribution System Operations

Attachments: None

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stinger Tim Interrogatories - KCC_20191120
Date of Response: 12/2/2019

Question:7

Please provide an outage report from 6/9/18 through the present for all customers on the same transformer as the Fitzpatricks.

Response:

The response is considered **CONFIDENTIAL** as it contains information relating directly to specific customers.

There are 6 addresses served off of the same transformer. They are:



All 6 of the customers have experienced the same outages (listed below) since 6/9/18.

Start Date/Time	End Date/Time	Customers Affected	Event Device	Cause	Action Taken
7/21/19 3:27 AM	7/21/19 4:19 AM	1540	br_R5052_5052	VEGETATION TREES	RESTORED BY switching
6/21/19 7:17 AM	6/21/19 10:05 AM	1104	br_R5052_5052	WEATHER	RESTORED BY switching
5/18/19 12:37 PM	5/18/19 2:03 AM	30	disconnect_OH_4871_976412	UNPLANNED SAFEWORK	REFUSED
1/12/19 2:48 AM	1/13/19 2:44 PM	30	disconnect_OH_4871_976412	VEGETATION TREES	REFUSED
8/5/18 1:12 AM	8/5/18 6:31 AM	331	OH_1002689	VEGETATION TREES	PUT UP PRIMARY
6/9/18 8:59 PM	6/9/18 10:42 PM	385	disconnect_OH_S1921268_1921268	EQUIPMENT FAILURE	PUT UP PRIMARY
6/9/18 7:44 PM	6/9/18 8:28 PM	1216	br_R5052_5052	VEGETATION TREES	CLOSED BREAKER

After a call-in from the customer on 4/24/19, we replaced a bad hot leg connection at the pole. It is possible that a poor connection such as this could cause momentary interruptions of service to customers served from this transformer.

Information Provided By: Justin Pippitt

Attachment: Q7_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20191212
Date of Response: 12/17/2019

Question:9

As a follow up from the Data Request 1 Response: the AMI reported power off on 4/17/19 at 18:09 and back on 4/24/19 at 22:25. Can you check your records to verify the power was off for 7 days? If the power was off for 7 days, why didn't someone go out? For unplanned outages (other than storms), Is there a report that shows the number of meters that are off for more than 12 hours at a time? How many meters showed the outage?

Response:

The records we have do make it appear that way, but the caution is that our communications with AMI are imperfect. It's possible the meter would have powered up and we didn't receive the communication. Sending a lineman to check on every meter that we do not receive a power up from after a power off would result in a great number of wasted trips. Operations does not receive any reports of meters not showing power for a specific time period, but this would be problematic because of meters that are disconnected intentionally. We only saw the one meter reporting an outage on this transformer.

Information Provided By: Daniel Munkers

Attachment: Q9_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20191212
Date of Response: 12/18/2019

Question:10

As a follow up from the Data Request 3 Response: on the 8/5/18 outage, it is noted that no description is available for the outage type except for Vegetation trees. Do you know if the primary or secondary was involved? Were any tree crews called out? How many customers were affected by the outage?

Response:

Two phases of the primary were involved (down). No tree crews were called out. There were 331 customers affected by the outage.

Response provided by: Justin Pippett, Mgr. Distribution System Engineering

Attachment: Q10_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20191212
Date of Response: 12/19/2019

Question:12

Data Request Response 5 indicates that there are issues with the software that have proven single outage reports to be unreliable. Please explain further the software problem. Is the software problem being reviewed? Is the software problem all throughout the company, or just Evergy KS Metro? If a single meter says there is no power at a residence, would a service person never be sent to the premise? How many customer meters need to indicate no power before a service person is dispatched? How many AMI meters have been replaced year-to-date in the Evergy KS Metro service territory?

Response:

The software is supposed to provide functionality that prevents meters that have been intentionally disconnected (or soon to be intentionally disconnected) from reporting an outage. This includes pulling meters for customer work and meter exchanges. When this component failed we had multiple wasted trips every day where we sent a trouble truck on an outage only to find crews working. Our IT group is working to resolve the issue and once it is fixed we will resume the practice of sending a truck to a single outage report. This impacts all of Legacy KCP&L. If a single residence indicates 4 or more outages in the same week, it shows up on a report and we investigate, regardless of method the outage was reported. If 2 or more meters on the same transformer report an outage we will respond. There have been 15,978 AMI meter exchanges in the Kansas Metro service territory.

Information Provided By: Daniel Munkers

Attachment: Q12_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20191212
Date of Response: 12/18/2019

Question:14

In reference to Data Request 7 Response, you stated that on 5/18/19 the outage started at 12:37 PM and ended at 2:03 AM. Please verify the date and times for accuracy. Please explain "Unplanned Safework, refused."

Response:

The response should state the outage started at 12:37 AM and ended at 3:03 AM. There were some formatting errors when copying the data over which required manual manipulation and the time was inadvertently input incorrectly.

An upstream switch was opened to create a clearance area that allowed the work to be completed in a safe manner. In this case, "refused" means the opened upstream switch was re-closed (the operators don't have an option in the Outage Management System for "re-closed switch", so "refused" is used).

Response provided by: Justin Pippett, Mgr. Distribution System Engineering

Attachment: Q14_Verification.pdf

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20200207
Date of Response: 2/18/2020

Question:16

How many customer outages have lasted longer than 12 hours in 2019?

Response:

The total amount of customer outages that have lasted longer than 12 hours in 2019 is 155,452.
The attached spreadsheet, Q16_number of customers out longer than 12hrs in 2019.xlsx,
contains the actual data.

Response provided by: Anthony Shaw

Attachment: Q16_number of customers out longer than 12hrs in 2019.xlsx
[– spreadsheet contains 7400 lines and is available upon request. Staff]

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20200207
Date of Response: 2/18/2020

Question:19

- A. DR 12 indicated IT was working to resolve the issue of the meter reporting an outage when the meter was intentionally disconnected. Has this issue been resolved? If not, what is the estimated date to resolve?
- B. Why was the number "4" reported outages per week chosen to investigate instead of another number?
- C. If it takes two or more meters on the same transformer to report an outage, how are rural customers who are the only service from a transformer being treated? Do they have to call the outage in?

Response:

A – An alternate process has been put in place to address customers identified on the Cut List. That takes care of approximately 95% of the issues. The MDM team is still researching why some customers are not being removed from the Cut List. Since the root cause remains unknown, no estimated date has been set and this work will be completed as soon as practical.

B – Because re-closures will try 3 times to before they will lock out. So only the meters that have gone off 4 times will make the meters off report.


C – Yes, that is correct. Rural customers will have to manually call in their outages. Which they do.

Response provided by: Anthony Shaw

Attachments: None

Response to Stinger Tim Interrogatories - KCC_20200227
Date of Response: 3/4/2020

kWh Interval data:

Measuring Component: 1224715617522 / KWH Delivered (15 minute)		
Main Log		
Measurements - Interval		
Measurement Date/Time	Measurement	Additional Details
	kWh	
		Condition: Regular , Combined Multiplier: 1.000000
		Condition: Regular , Combined Multiplier: 1.000000
		Condition: Regular , Combined Multiplier: 1.000000
		Condition: Regular , Combined Multiplier: 1.000000
		Condition: Partial Interval , Combined Multiplier: 1.000000
		Condition: No Read - Outage , Combined Multiplier: 1.000000

Response provided by:

Brad Walsh, Supervisor Measurement Technology and
Justin Pippitt, Manger Operations Engineering

Attachments: None

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stinger Tim Interrogatories - KCC_20200227
Date of Response: 3/4/2020

Question:21

On the 4/9/19 customer outage,

1. Did the customer call in the outage? If so, what time was the call and what was the duration of the call?
2. Was the meter manually pinged at 18:46 for the customer at [REDACTED] ?
3. What time was the ticket initiated and what time was it cancelled?

Response:

The response is considered **CONFIDENTIAL** as it contains information relating directly to a specific customer.

1. The customer did not call in. An outage was reported by the AMR meter.
2. No
3. The ticket was initiated at 13:41 and cancelled at 14:02.

Response provided by: Justin Pippitt, Manger Operations Engineering

Attachments: None

Evergy Kansas Metro
Case Name: 2019 Fitzpatrick Complaint
Case Number: 20-KCPE-107-COM

Response to Stringer Tim Interrogatories - KCC_20200505
Date of Response: 5/14/2020

Question:25

The customer at [REDACTED] (Kenilworth 5032 circuit), experienced outages on 6/9/18, 8/5/18, 1/12/19, 5/18/19, 6/21/19, and 7/21/19. Did any of the outages occur on an MED day (as defined by IEEE 1366)?

Response:

The response is considered CONFIDENTIAL as the question contains information relating directly to a specific customer.

Yes, of those dates, the following three dates qualified as IEEE1366 Major Event Days:

- January 12, 2019
- June 21, 2019
- July 21, 2019

Attachment: Q25_Verification_Lutz.pdf

(B) Minimum Size. The conductors shall not be smaller than 8 AWG copper or 6 AWG aluminum or copper-clad aluminum.

Exception: Conductors supplying only limited loads of a single branch circuit — such as small polyphase power, controlled water heaters, and similar loads — shall not be smaller than 12 AWG hard-drawn copper or equivalent.

(C) Grounded Conductors. The grounded conductor shall not be less than the minimum size as required by 250.24(C).

230.24 Clearances. Overhead service conductors shall not be readily accessible and shall comply with 230.24(A) through (E) for services not over 600 volts, nominal.

(A) Above Roofs. Conductors shall have a vertical clearance of not less than 2.5 m (8 ft) above the roof surface. The vertical clearance above the roof level shall be maintained for a distance of not less than 900 mm (3 ft) in all directions from the edge of the roof.

Exception No. 1: The area above a roof surface subject to pedestrian or vehicular traffic shall have a vertical clearance from the roof surface in accordance with the clearance requirements of 230.24(B).

Exception No. 2: Where the voltage between conductors does not exceed 300 and the roof has a slope of 100 mm in 300 mm (4 in. in 12 in.) or greater, a reduction in clearance to 900 mm (3 ft) shall be permitted.

Exception No. 3: Where the voltage between conductors does not exceed 300, a reduction in clearance above only the overhanging portion of the roof to not less than 450 mm (18 in.) shall be permitted if (1) not more than 1.8 m (6 ft) of overhead service conductors, 1.2 m (4 ft) horizontally, pass above the roof overhang, and (2) they are terminated at a through-the-roof raceway or approved support.

Informational Note: See 230.28 for mast supports.

Exception No. 4: The requirement for maintaining the vertical clearance 900 mm (3 ft) from the edge of the roof shall not apply to the final conductor span where the service drop is attached to the side of a building.

Exception No. 5: Where the voltage between conductors does not exceed 300 and the roof area is guarded or isolated, a reduction in clearance to 900 mm (3 ft) shall be permitted.

(B) Vertical Clearance for Overhead Service Conductors. Overhead service conductors, where not in excess of 600 volts, nominal, shall have the following minimum clearance from final grade:

(1) 3.0 m (10 ft) — at the electrical service entrance to buildings, also at the lowest point of the drip loop of

the building electrical entrance, and above areas or sidewalks accessible only to pedestrians, measured from final grade or other accessible surface only for service-drop cables supported on and cabled together with a grounded bare messenger where the voltage does not exceed 150 volts to ground

(2) 3.7 m (12 ft) — over residential property and driveways, and those commercial areas not subject to truck traffic where the voltage does not exceed 300 volts to ground

(3) 4.5 m (15 ft) — for those areas listed in the 3.7-m (12-ft) classification where the voltage exceeds 300 volts to ground

(4) 5.5 m (18 ft) — over public streets, alleys, roads, parking areas subject to truck traffic, driveways on other than residential property, and other land such as cultivated, grazing, forest, and orchard

(C) Clearance from Building Openings. See 230.9.

(D) Clearance from Swimming Pools. See 680.8.

(E) Clearance from Communication Wires and Cables. Clearance from communication wires and cables shall be in accordance with 800.44(A)(4).

230.26 Point of Attachment. The point of attachment of the service-drop conductors to a building or other structure shall provide the minimum clearances as specified in 230.9 and 230.24. In no case shall this point of attachment be less than 3.0 m (10 ft) above finished grade.

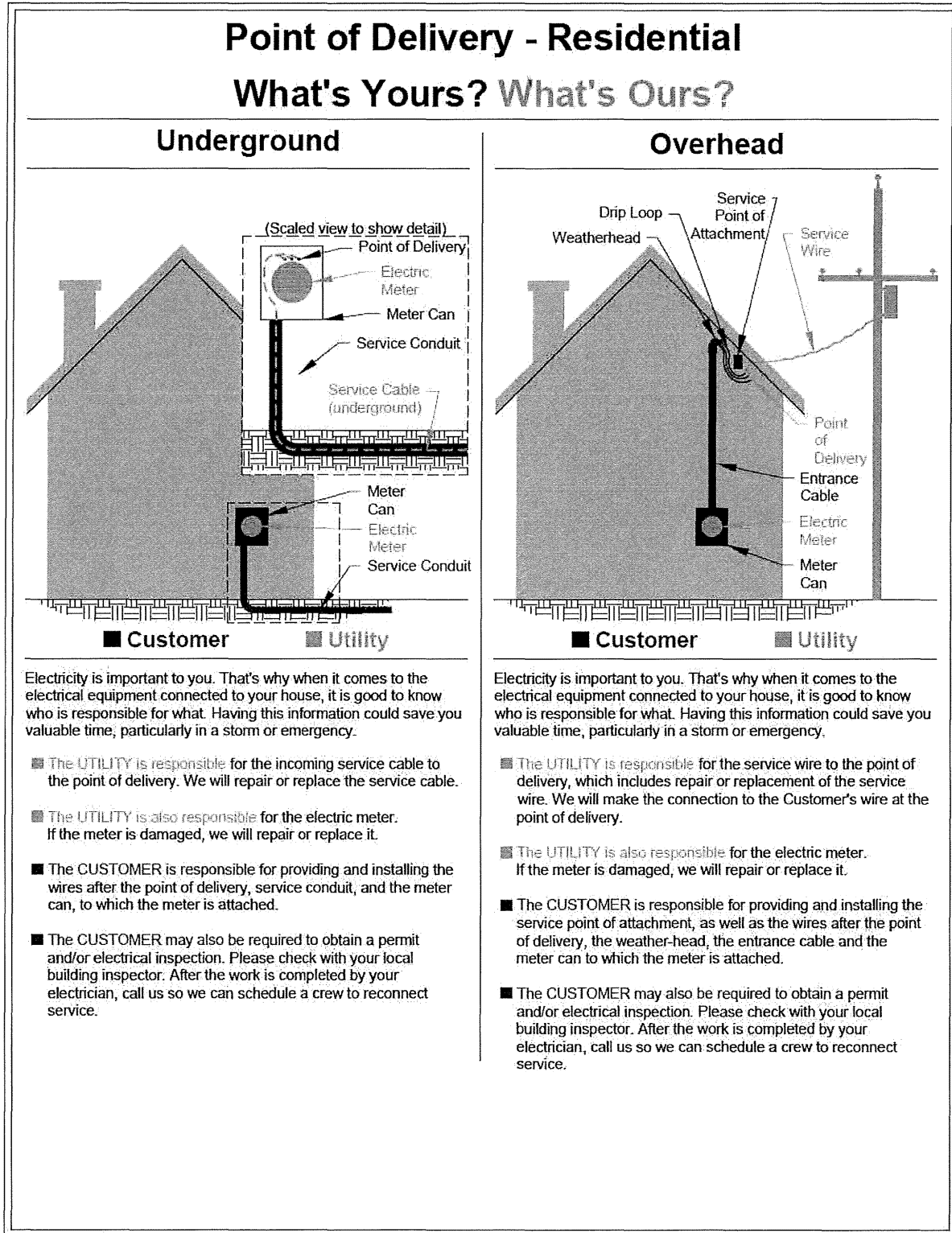
230.27 Means of Attachment. Multiconductor cables used for overhead service conductors shall be attached to buildings or other structures by fittings identified for use with service conductors. Open conductors shall be attached to fittings identified for use with service conductors or to non-combustible, nonabsorbent insulators securely attached to the building or other structure.

230.28 Service Masts as Supports. Where a service mast is used for the support of service-drop conductors, it shall be of adequate strength or be supported by braces or guys to withstand safely the strain imposed by the service drop. Where raceway-type service masts are used, all raceway fittings shall be identified for use with service masts. Only power service-drop conductors shall be permitted to be attached to a service mast.

230.29 Supports over Buildings. Service conductors passing over a roof shall be securely supported by substantial structures. Where practicable, such supports shall be independent of the building.

Drawings

10.1 – Point of Delivery



CERTIFICATE OF SERVICE

20-KCPE-107-COM

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Addendum to Staff's Report and Recommendation was served via electronic service this 25th day of August, 2020, to the following:

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